

REMARKS

Claims 1 – 18, 20, and 23 are in the application. Claims 1, 9, 20, and 23 were previously presented; claims 2 – 6, 21, and 22 are withdrawn; claims 19, 24, and 25 are canceled; and claims 7, 8, and 10 – 18 remain unchanged from the original versions thereof. Claims 1, 20, and 23 are the independent claims herein. No new matter has been added to the application as a result of the amendments submitted herein.

Election/Restrictions

The Requirement for Election/Restriction stated that restriction to one of the following groups of claims was required under 35 U.S.C. 121:

- I. Claims 1 – 18 and 20 – 23, drawn to a method, apparatus and computer program for the analysis of commercial mortgage-backed portfolios, classified in class 705, subclass 36.
- II. Claim 19, drawn to a computer-implemented method of analysis of commercial-mortgage-backed portfolios, including determining category size for each rating category, calculating combined profitability, computing resulting profitability based on trial spread, adjusting trial loan spread, classified in class 705, subclass 38.

Regarding Group I, the Requirement for Election/Restriction further stated that claims 1, 20, and 23 are generic to the following species:

- IA. Claims 2- 3;
- IB. Claims 4 -6;
- IC. Claims 7 – 18;
- ID. Claim 21; and
- IE. Claim 22.

Applicant responds to the Requirement for Election/Restriction by electing to further prosecute the following claims:

Claims 1, 7 – 18, 20, and 23 (Group I, Species IC)


Reconsideration and further examination of the application are respectfully requested.

CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-5985.

Respectfully submitted,

December 5, 2006
Date


Randolph P. Calhoun
Registration No. 45,371
Buckley, Maschoff & Talwalkar LLC
50 Locust Avenue
New Canaan, CT 06840
(203) 972-5985